

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Ronald L McFeaters  Debtor	Chapter 7 Proceeding  17-22775 GLT
Natalie Lutz Cardiello, Esquire Movant  v. PENNYMAC LOAN SERVICES, LLC Respondent	

**RESPONSE TO CHAPTER 7 TRUSTEE'S  
APPLICATION TO EMPLOY (2)BK GLOBAL REAL ESTATE SERVICES AND JAMES  
KEFFALAS AS REALTOR**

AND NOW, comes PENNYMAC LOAN SERVICES, LLC (Respondent) by and through its counsel, POWERS, KIRN & ASSOCIATES, LLC, (Jill Manuel-Coughlin, on behalf of the firm), and hereby Objects/Responds to Application to Employ (2)BK Global Real Estate Services and James Keffalas as Realtor and avers the following:

1. Denied as stated. By way of further response, on 11/14/2017, this Court entered an Order Granting Respondent Relief from the Automatic Stay to proceed with its Foreclosure action against the property located at 102 Ethan Hill Drive, Harrisville, PA 16038.
2. Denied.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted in part, Denied in part. Respondent admits that there is no equity in the Property. By way of further response, Respondent filed its Motion for Relief on 10/17/2017 indicating a current amount due on this account as of 9/18/2017 in the amount of \$171,951.24.
8. Denied. Respondent does not Consent nor agree to pay the Trustee, any realtors, or other parties for any Sale of the mortgaged property where there is clearly no equity in the property and it will not be paid its full amount due. The Trustee's need to sell the Property for a reduced payoff is not acceptable to Respondent in as much as it is proceeding with an imminent Sheriff's Sale of the Property.
9. Denied. On 10/17/2017, this Court granted Respondent Relief from the Automatic Stay to proceed with its Foreclosure Action.

10. Denied. On 10/17/2017, this Court granted Respondent Relief from the Automatic Stay to proceed with its Foreclosure Action.
11. Denied. Strict Proof of hereby demanded at the time of the hearing.
12. Denied. Strict Proof of hereby demanded at the time of the hearing.
13. Denied. Respondent does not consent to payment of any compensations, broker fees, or any fees other than the Sheriff's costs for conducting a judicial foreclosure of the Property.
14. The allegations of this paragraph do not pertain to Respondent. To extent that a response is required, Respondent hereby denies same.
15. The allegations of this paragraph do not pertain to Respondent. To extent that a response is required, Respondent hereby denies same.

WHEREFORE, Respondent respectfully requests the Honorable Court ORDER:

The Chapter 7 Trustee's Application to Employ (2)BK Global Real Estate Services and James Keffalas as Realtor relating to the property located at 102 Ethan Hill Drive, Harrisville, PA 16038 is DENIED.

RESPECTFULLY SUBMITTED,  
POWERS, KIRN & ASSOCIATES, LLC

**/s/ Jill Manuel-Coughlin, Esquire**  
POWERS, KIRN & ASSOCIATES, LLC  
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Attorney for Respondent/ 17-0104  
Date: November 22, 2017